

~~SEALED BY ORDER  
OF COURT~~

1 ALEX G. TSE (CABN 152348)  
 2 Acting United States Attorney  
 3  
 4 BARBARA J. VALLIERE (DCBN 439353)  
 5 Chief, Criminal Division  
 6  
 7 SUSAN KNIGHT (CABN 209013)  
 8 Assistant United States Attorney

9  
 10 150 Almaden Boulevard, Suite 900  
 11 San Jose, California 95113  
 12 Telephone: (408) 535-5056  
 13 FAX: (408) 535-5066  
 14 E-Mail: susan.knight@usdoj.gov

15 Attorneys for United States of America

16  
 17 UNITED STATES DISTRICT COURT  
 18  
 19 NORTHERN DISTRICT OF CALIFORNIA

20  
 21 UNITED STATES OF AMERICA,

22 Plaintiff,

23 v.

24 VASILE MEREACRE,

25 Defendant.

26 SAN JOSE DIVISION

27 ) CR 18 00348 NC  
 28 ) No. CR  
 29 ) ) UNITED STATES' APPLICATION AND  
 30 ) ) [PROPOSED] ORDER TO SEAL INDICTMENT  
 31 ) ) AND ARREST WARRANT AND UNSEAL FOR  
 32 ) ) THE LIMITED PURPOSE OF EXTRADITION

33 On August 2, 2018, a federal grand jury in the Northern District of California returned an  
 34 indictment charging defendant Vasile Mereacre with one count of Conspiracy, in violation of Title 18,  
 35 United States Code, Section 1030(b), and one count of Extortion Involving Computers, in violation of  
 36 Title 18, United States Code, Sections 1030(a)(7)(B) and (c)(3)(A). The defendant resides in Toronto,  
 37 Canada. He is a Canadian citizen with ties to Moldova.

38 The United States, through undersigned counsel, respectfully moves this Court to seal the  
 39 Indictment and arrest warrant in order to prevent the defendant from fleeing from Canada to Moldova or  
 40 another country. The United States intends to extradite the defendant from Canada to the Northern  
 41 District of California, and anticipates that the defendant will be arrested by Canadian authorities  
 42 pursuant to a provisional arrest warrant. Therefore, the United States requests that the Indictment be  
 43 U.S.' APPLICATION AND [PROPOSED] ORDER

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1 unsealed for the limiting purpose of providing it to the Canadian government to facilitate the defendant's  
2 arrest and extradition.

3 DATED: 8/1/18

Respectfully submitted,

4 ALEX G. TSE  
5 Acting United States Attorney

6   
7 SUSAN KNIGHT  
8 Assistant United States Attorney

9 ~~[PROPOSED] ORDER~~

10 On the motion of the United States, and good cause appearing therefor, the Court HEREBY  
11 ORDERS that the Indictment and arrest warrant in the above-captioned matter be sealed.

12 The Court FURTHER Orders that the Indictment is unsealed for the limited purpose of providing  
13 it to Canadian authorities as part of the United States' request for a provisional arrest warrant and  
14 extradition of the defendant.

15 IT IS SO ORDERED.

16 DATED: August 2, 2018

  
17 HONORABLE NATHANAEL COUSINS  
18 United States Magistrate Judge